

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re:

Thomas J. Prim,  
Debtor.

Case No. 23-10256-AMC

Chapter 13

**Motion to Modify Plan After Confirmation**

Debtor Thomas J. Prim, through his attorney, moves this Court as follows:

1. The Plan was confirmed on November 14, 2024. It is a 100% plan.
2. The Debtor wishes to amend the plan to lower the base plan amount to \$39,695.87 to conform to an amended claim that will soon be filed by creditor Karalis PC in the amount of \$17,000.00.
3. The Debtor therefore requests approval of the Second Amended Plan filed at ECF No. 111.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: November 21, 2024

CIBIK LAW, P.C.  
*Attorney for Debtor*

By: /s/ Michael A. Cibik

Michael A. Cibik (#23110)  
1500 Walnut Street, Suite 900  
Philadelphia, PA 19102  
215-735-1060  
help@cibiklaw.com